

**COMMITMENT & INTEGRITY**  
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March 31, 2015



Mr. Kurt Limesand  
U.S. Environmental Protection Agency Region 7  
11201 Renner Boulevard  
Lenexa, Kansas 66219

Re: Approval Conditions Submittal  
PCB Cleanup and Risk-Based Disposal Approval under 40 CFR 761.61(c)  
Love Library North, University of Nebraska  
Lincoln, Nebraska

Dear Mr. Limesand:

On behalf of the University of Nebraska - Lincoln (UNL) and in accordance with the U.S. Environmental Protection Agency's (EPA's) February 9, 2015 PCB Cleanup and Risk-Based Disposal Approval under 40 CFR 761.61 (c) ("the Approval") for the above-mentioned site, this letter provides notification of a minor modification to the proposed PCB remediation activities, pursuant to Condition 2 of the Approval.

During the kick-off meeting with the project team (construction contractors, abatement contractors, window contractors, etc.), it was identified that the soffit located on the east and west sides of the building (and a small portion of the south side) will need to be removed to facilitate the removal of the first floor windows, as well as being removed as part of the construction activities. The soffit consists of plaster and is in direct contact with the upper header PCB-containing window caulking.

In evaluating materials management options for this plaster soffit, the project team has decided to remove the entire plaster panel coated with the PCB containing window caulking along the length of the east and west sides of the building (approximately 300 linear feet) and manage all materials as PCB Bulk Product Waste. This approach is similar to the approved material management approach for the concrete walkways on the east and west sides of the building. In addition, the soffit removal is one of the initial actions that needs to be completed in the project sequencing (starting next week); therefore, the project schedule does not afford the flexibility for a sampling and cut-line segregation approach. Because, the entire soffit panels will be removed, there will be no materials remaining in place and thus verification sampling is not warranted.

The one exception to this approach is on the south side where a partial removal of the soffit is planned. In this area, there is approximately 5 linear feet of soffit in two separate sections (10 feet in total). One bulk sample was collected from each five-foot section at the mid-point of the panel and submitted for PCB analyses. These data should be received later this week and will be forwarded to the EPA upon receipt. If the samples detect PCBs < 1 ppm, then a "clean" cut-line will be demonstrated. As such, the full panel coated with the PCB-containing caulking will be removed as PCB Bulk Product Waste and the remaining adjacent panels (beyond the sample/cut-line) on the south side of the building will remain in place.